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8 UNITED STATES BANKRUPTCY COURT
9 EASTERN DISTRICT OF WASHINGTON

10
11 In re:) Case No. 18-03197-FPC11
12 GIGA WATT INC,)
13 Debtor in Possession.) DECLARATION OF LISA PARKS IN
14) SUPPORT OF MOTION TO SHORTEN TIME
15) FOR NOTICE AND OBJECTION TO
16) STIPULATED MOTION TO MODIFY THE
17) AUTOMATIC STAY

18 I, LISA PARKS, am the Executive Director of the Port of Douglas County
19 ("Port"). I have personal knowledge of the facts contained in this declaration.

20 Pursuant to the prior stipulation entered into between the Trustee and the Port
21 of Douglas County, the Port retained a contractor, KRCI, to fill the hole left by the
22 Debtor and remove debris on Lots 8 and 9 and perform other work authorized pursuant
23 to a prior stipulation between the Port and the Trustee. There are also various berms
24 all over the Port's property, off of Lots 8 and 9, and the concrete foundation and
25 grounding mat for the proposed substation that was never built, that need to be
removed and leveled so the ground can be restored to its pre-lease condition to allow

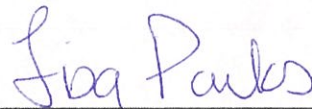
DECLARATION - 1

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1 the Port to market it again. The Debtor also left debris all over the Ports property that
2 needs removed. The Port wants to approve a change order while the contractor is still
3 on site. If the contractor leaves the Pangborn site and removes his equipment and
4 then brings it back, the bid will be between \$10,000-\$15,000 higher. Therefore, time is
5 of the essence so the Port can approve a change order and use a portion of the
6 remaining surety deposit of Debtor to pay the contractor for the remaining ground
7 remediation and cleanup work.

8 I declare under penalty of perjury under the laws of the State of Washington that
9 all the statements contained herein are true and correct to the best of my knowledge,
10 information, and belief.

11 DATED this 23rd day of October 2019, at East Wenatchee, Washington.

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14 Lisa Parks

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DECLARATION - 2

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